

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In the Matter of	)	
	)	
Advanced Television Systems	)	
and Their Impact upon the	)	MM Docket No. 87-268
Existing Television Broadcast	)	
Service	)	
	)	

To: The Commission

**BLADE SUPPLEMENT TO PETITION FOR RECONSIDERATION**

Blade Communications, Inc. ("Blade"), licensee of four television stations located throughout the United States, by its attorneys, and pursuant to the Commission's Order,<sup>1/</sup> hereby supplements its June 13, 1997, Petition for Reconsideration ("Petition") of the *Sixth Report and Order* in MM Docket No. 87-268, FCC 97-115 (released April 21, 1997) ("*Sixth R&O*"), insofar as requesting adjustments to the DTV Table of Allotments. In the Petition, Blade stated its belief that, by allowing interested parties a brief additional comment period to provide a more thorough analysis, the Commission could more efficiently and expeditiously fix discrete problems in the DTV Table of Allotments than by reviewing a plethora of separate rulemaking petitions and notification applications after the DTV Table became final. Blade appreciates the opportunity offered by the Commission and, accordingly, Blade is providing herewith supplemental information regarding one of its stations — KTRV-TV, Nampa, ID — and requests modification of its DTV allotment.

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<sup>1/</sup> Advanced Television Systems, *Order*, MM Docket No. 87-268, DA 97-1377 (rel. July 2, 1997).

In the *Sixth R&O*, the Commission proposed to allocate Channel 27 as KTRV-TV's paired DTV channel. KTRV-TV currently broadcasts on NTSC Channel 12. Blade requests that the Commission reassign Channel 44 to KTRV-TV as its DTV allotment. As shown in the technical exhibit ("Attachment A"), operation on Channel 44 would create no new interference and would thus be in satisfaction of the Commission's criteria regarding modifications to the DTV Table.<sup>2/</sup> DTV transmissions on Channel 44 would avoid the problems associated with a number of nearby, adjacent-channel DTV broadcasts which would affect operation on Blade's allotted DTV channel. Allowing KTRV-TV to determine for itself that it would prefer this alternative allotment is consistent with the notion of broadcaster choice that is at the nucleus of the free-market principles consistently relied upon by the Commission in the *Sixth R&O*.

Blade requests that the initial allotment of DTV Channel 27, as provided in the *Sixth R&O*, be reserved until such time that the new allotments have been fully tested and the Commission has completely authorized operation of the channels without reservation. Blade understands that the Commission will want to thoroughly analyze the requested modification given the concerns of interference "ripple," and that the Commission will be hesitant, as a general proposition, to modify the DTV Table. Accordingly, while Blade is convinced of the meritorious nature of its suggested modification, because of the uncertainty of the Commission's treatment of modifications to the Table, and the uncertainty associated with any new technology, Blade respectfully requests that the Commission refrain from

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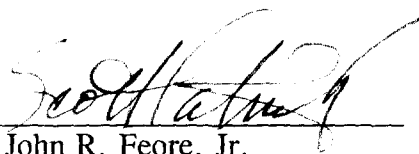
<sup>2/</sup> *Sixth R&O* at ¶222.

reassigning the initial allotment until such time that Commission has removed any conditions on the operation of the channel and that Blade has tested full operation.

For the reasons stated in the foregoing, and as demonstrated in the attached technical exhibit, Blade requests that the Commission reassign DTV Channel 44 to KTRV-TV.

Respectfully submitted,

BLADE COMMUNICATIONS, INC

By:   
John R. Feore, Jr.  
Scott S. Patrick

Its Attorneys

Dow, Lohnes & Albertson, PLLC  
1200 New Hampshire Avenue, N.W.  
Suite 800  
Washington, D.C. 20036-6802  
202-776-2000

Dated: August 22, 1997

## **ATTACHMENT A**

### **Technical Exhibit**

ENGINEERING STATEMENT  
ON BEHALF OF  
KTRV(TV), NAMPA, IDAHO  
CONCERNING SUPPLEMENT  
TO PETITION FOR RECONSIDERATION  
MM DOCKET NO. 87-268

AUGUST 1997

COHEN, DIPPELL AND EVERIST, P.C.  
CONSULTING ENGINEERS  
RADIO AND TELEVISION  
WASHINGTON, D.C.

COHEN, DIPPELL AND EVERIST, P. C.

City of Washington            )  
  ) ss  
District of Columbia         )

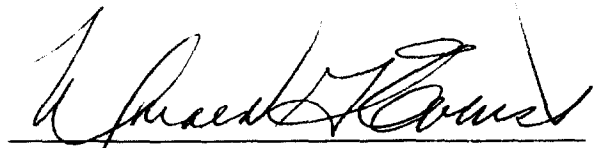
Donald G. Everist, being duly sworn upon his oath, deposes and states that:

He is a graduate electrical engineer, a Registered Professional Engineer in the District of Columbia, and is President of Cohen, Dippell and Everist, P.C., Consulting Engineers, Radio - Television, with offices at 1300 L Street, N.W., Suite 1100, Washington, D.C. 20005;

That his qualifications are a matter of record in the Federal Communications Commission;

That the attached engineering report was prepared by him or under his supervision and direction and

That the facts stated herein are true of his own knowledge, except such facts as are stated to be on information and belief, and as to such facts he believes them to be true.

  
\_\_\_\_\_  
Donald G. Everist  
District of Columbia  
Professional Engineer  
Registration No. 5714

Subscribed and sworn to before me this 15<sup>th</sup> day of August, 1997.

  
\_\_\_\_\_  
Notary Public

My Commission Expires: 8/28/98

This engineering statement has been prepared on behalf of Blade Communications Inc., licensee of KTRV(TV), Nampa, Idaho, and provides a further assessment than that provided in its Petition for Reconsideration entitled, "Engineering Statement in Support of Petition for Reconsideration, MM Docket No. 87-268 on Behalf of Blade Communications Inc., June 1997". This further assessment is based upon examination of OET Bulletin No. 69 released July 2, 1997.

Television station KTRV(TV) has been assigned a DTV channel adjacent to other DTV channels assigned to the area. Examination has been made of the data provided in a study<sup>1</sup> of DTV signal behavior in circuits typically found in high powered UHF amplifiers. The study characterizes, among other things, out-of-band emissions by a DTV signal generated by a non-linear final radio frequency (RF) amplifier. The data places in doubt the ability to generate, maintain, and receive a first-adjacent DTV channel emission standard proposed by the Federal Communications Commission in MM Docket 87-268.

It is noted that KTRV(TV) has filed an application (FCC File No. BPCT-960711KF) for a new site. In order to enhance the ability to operate from a non-collocated site, it is advisable that a new DTV channel be requested. Further KTRV(TV) is aware that field measurements made by this firm and preliminary results from a full site survey by Hammett & Edison indicate radio frequency levels in excess of current Federal Communications Commission guidelines. This is the prime reason

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<sup>1</sup>From a presentation entitled, "Transmitter Considerations for ATV (DTV), Robert J. Plonka, Harris Corp., Broadcast Division, November 22, 1996.

KTRV(TV) is seeking an alternate site since it recognizes that multiple DTV operations from the existing site without significant improvement in radio frequency level management is not prudent.

Therefore, a frequency search has been conducted for another frequency that can be assigned and remove this potential source of interference to and from other stations. Attached hereto is an allocation study for Channel 44. As shown, DTV Channel 44 can be assigned in lieu of DTV Channel 27 and it will essentially replicate the DTV service as proposed for KTRV(TV).



COHEN, DIPPELL AND EVERIST, P. C.

TABLE I  
PROPOSED CHANNEL 44 DTV TO NTSC  
ALLOCATION STUDY  
AUGUST 1997

<u>Channel</u>	<u>Call</u>	<u>City/State</u>	<u>Distance</u>	
			<u>Actual</u> km	<u>Required</u> km
N	44	KTRV-DTV Nampa, ID	--	--
N-15	29	None within 150 km	--	96.6
N-14	30	None within 150 km	--	96.6
N-8	36	None within 150 km	--	96.6
N-7	37	None within 150 km	--	96.6
N-4	40	None within 150 km	--	96.6
N-3	41	None within 150 km	--	96.6
N-2	42	None within 150 km	--	96.6
N-1	43	None within 150 km	--	88.5
N	44	None within 300 km	--	244.6
N+1	45	None within 150 km	--	88.5
N+2	46	None within 150 km	--	96.6
N+3	47	None within 150 km	--	96.6
N+4	48	None within 150 km	--	96.6
N+7	51	None within 150 km	--	96.6
N+8	52	None within 150 km	--	96.6

COHEN, DIPPELL AND EVERIST, P. C.

TABLE II  
DTV TO NTSC  
FCC CHANNEL 27 ALLOCATION STUDY  
AUGUST 1997

<u>Channel</u>	<u>Call</u>	<u>City/State</u>	<u>Distance</u>	
			<u>Actual</u> km	<u>Required</u> km
N	27	KTRV-DTV Nampa, ID	--	--
N-8	19	None within 150 km	--	96.6
N-7	20	None within 150 km	--	96.6
N-4	23	None within 150 km	--	96.6
N-3	24	None within 150 km	--	96.6
N-2	25	None within 150 km	--	96.6
N-1	26	None within 150 km	--	88.5
N	27	None within 300 km	--	244.6
N + 1	28	None within 150 km	--	88.5
N + 2	29	None within 150 km	--	96.6
N + 3	30	None within 150 km	--	96.6
N + 4	31	None within 150 km	--	96.6
N + 7	34	None within 150 km	--	96.6
N + 8	35	None within 150 km	--	96.6

COHEN, DIPPELL AND EVERIST, P. C.

TABLE III  
DTV TO DTV  
ALLOCATION STUDIES  
AUGUST 1997

<u>Channel</u>	<u>Call</u>	<u>City/State</u>	<u>Distance</u>	
			<u>Actual</u> km	<u>Required</u> km
N	44	KTRV-DTV Nampa, ID	--	--
N-1	43	None within 130 km	--	88.5
N	44	None within 275 km	--	223.7
N + 1	45	None within 130 km	--	88.5

<u>Channel</u>	<u>Call</u>	<u>City/State</u>	<u>Distance</u>	
			<u>Actual</u> km	<u>Required</u> km
N	27	KTRV-DTV Nampa, ID	--	--
N-1	26	KTVB Boise, ID	0.1	$\leq 32.2$
N	27	None within 300 km	--	223.7
N + 1	28	None within 150 km	--	88.5